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UNITED STATE DISTRICT COURT
CENTRAL DISTRICT
SOUTHERN DIVISION

2019 JAN 24 PM 3:37

CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF
SANTA ANA

BY LAU

Narula, Ripdaman)
Plaintiff)
v.)
Orange County Superior Court)
Orange County Sheriff's Department)
City of Laguna Niguel)
City of Santa Ana)
Arbitration Forums)
California Highway Patrol)
Does 1 thru 20 inclusive)
Defendants)

Civil Action No. _____

SACV19-00133 DSF (JC)
COMPLAINT

This is a claim for violation of civil right based on 42 USC 1983
and for violation of the constitutional rights
per the 14th Amendment to the U. S. Constitution.

JURISDICTION

This court has jurisdiction over the lawsuit per 28 USC 1331 and also per 28 USC 1332 for Arbitration Forums is located in Florida.

VENUE

This District Court is the proper venue for most of the events occurred here in this district of the court.

Respectfully Submitted

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ABBREVIATIONS

CHP	California Highway Patrol
C. O. A.	Cause of Action
C. R.	Crime Report
DMV	Department of Motor Vehicles
LACSDU	Los Angeles County Sheriff's Deputies Union
OCSC	Orange County Superior Court
OCSD	Orange County Sheriff's Department
OCSDU	Orange County Sheriff's Deputies Union
P.	Plaintiff
V.C.	Vehicle Code (California)

Plaintiff alleges:

First Cause of Action
Falsifying the Crime Report

1. That this cause of action is against the City of Laguna Niguel and against the Orange County (O.C.) Sheriff's Department, jointly and severally, for falsify a c. r.

1A. Plaintiff is ignorant of the true names of the defendants Does. While they are believed to have participated in this action, they are the agents of the city and of the Sheriff's department. Here they are referred to, to make sense of the facts.

2. The plaintiff went to Sheriff's Journey substation to file a crime report (c. r.) Plaintiff gave a stack of papers to officer (Doe 1) at the front desk. Officer read, got up and went inside with all the papers.

3. Officer came back and told plaintiff to go to Santa Ana to file a c. r. for it was a financial crime.

4. Plaintiff followed the directions and went to Santa Ana, but no c. r. was taken.

4A. Since then plaintiff has come to believe that the place he was sent to, was actually the place where they bring suspects for interrogation.

4B. So the purpose of sending the plaintiff to Santa Ana, plaintiff believes, was to have him intimidated by (jailer?) sergeant (Doe 2).

4C. Plaintiff also believes that Doe 1 or someone else made a copy of the papers. And did not give plaintiff a receipt of those papers.

4D. Based on the subsequent events, plaintiff has come to conclude that copies were made for a personal use, that is, to negotiate kickback with the suspect/criminal.

4E. From the subsequent events plaintiff has come to conclude that cops got kickback and made a deal with the suspect/criminal.

4F. Responsibility of this corruption lies with the captain of that police station – current one and the captain at the time.

4G. Not only captain of the Journey substation but also, I believe, captain of the station where I was sent to, be responsible for this kickback scheme.

5. Plaintiff lives in an area which is about 100 miles away from Santa Ana. A few days later, about a week or so, plaintiff came to Orange County and tried to file a c. r. again. Again no c. r. was taken.

1 6. It happened several times. Meanwhile plaintiff had discovered that city of
2 Laguna Niguel had its own Police department, and sheriff has a contract with the
city to provide police services.

3 7. After going there a few times they decided to take a c. r. However, plaintiff later
4 discovered, that the c. r. was falsified. Plaintiff has been trying to get it corrected,
5 but in vain.

6 8. Once plaintiff went to the city attorney's office to get it corrected. While
7 plaintiff was standing in front of the city attorney's (and also Mayor's) office, cops
8 were called. 2 cops came – a deputy (Doe 3) and a sergeant (Doe 4). Deputy in the
lead and the sergeant in toe.

9 9. When deputy was a few feet away, plaintiff thought that she was going to attack
10 him. So, plaintiff spoke first. Followings is basically the essence of the interaction:
11 plaintiff said, I came over Before plaintiff completed the sentence, deputy,
12 plaintiff felt, was in his personal space and very rudely said something to the affect,
13 do you live here? Plaintiff said, no, I live in ... and I came over to see the city
14 attorney. Deputy said, he is our attorney. Go where you live and file a c. r. there.
Plaintiff tried to explain that crime took place in this jurisdiction. But before
15 plaintiff finished his sentence, deputy very rudely said, **leave**.

16 10. Plaintiff was holding some papers in his hand and asked deputy if she would
like to have a copy of these papers. She said, no. She did not consult sergeant or
17 anyone else to say no.

18 **10A. Plaintiff left.**

19 11. Plaintiff did go back to the city of Laguna Niguel. City attorney's office is
located on the 2nd floor. Police department's office is located on the 1st floor.
20 Plaintiff went to police department's office on the 1st floor.

21 12. Plaintiff did talked to an officer (Doe 5) who came to the front desk. C. r. was
not corrected.

22 13. P wrote a letter to Sheriff to have the c. r. corrected. But the c. r. has not been
23 corrected.

24 14. As a proximate result of the aforementioned events plaintiff has suffered
25 mental anguish.

26 15. Plaintiff prays that city of Laguna Niguel and the Sheriff's department be
27 ordered to correct the c. r.

1 16. Plaintiff prays that he be compensated for the mental anguish in the amount of
2 \$1,000,000 from the city of Laguna Niguel and Sheriff's Department, jointly and
severally.

3 17. Plaintiff prays for a judgment for punitive and exemplary damage in the
4 amount as court deems appropriate against the city of Laguna Niguel and the
5 Sheriff's department, jointly and severally.

6 **Wherefore**, plaintiff prays for judgment as hereunder set forth.

7
8 **Second Cause of Action**

9 **Giving a Citation for Moving Traffic Violation**
10 **Based on Unconstitutional Law**

11 1. All the paragraphs, including the subparagraphs, if any, of the first cause of
12 action are incorporated herein by reference thereto.

13 2. This cause of action is against the city of Santa Ana for their police department
14 to give me a citation using an unconstitutional law, California Vehicle Code
15 section 22450(a).

16 3. Plaintiff believe that there was a conspiracy to violate his civil rights acting in
17 union with deputy(s) of the Sheriff department and/or deputies' union.

18 4. As to the Sheriff's department cops, one day I had a meal at about 5 p.m. in
19 Santa Ana downtown. It was a few days before I got this citation. While I was
20 having the meal, a Sheriff's van was parked across the street. After I finished
21 eating and wanted to pay the bill, person in charge there said, something to the
22 affect that it was on the house. I could see no reason why he wanted to serve me a
free meal. So, I insisted on paying and paid the bill.

23 4A. Later on, as I thought about it, why he wanted to give me a free meal, I
24 recalled Sheriff's van parked across the street. I began to wonder if the van had
anything to do with the offer of a free meal. And I conclude that it was more likely
than not that it did.

25 4B. As to why, I thought, it was to accuse me of leaving without paying for the
26 meal.

27 4C. So, it was to frame me. But I did not fall for it.
28

1 4D. As that attempt to frame me failed, Sheriff's deputies, I believe, turned to
2 Santa Ana police for help to stop me from wanting to correct the falsified c. r. This
3 is a background information for the next paragraph(s).

4 5. So, Santa Ana city cop gave me a citation for a stop sign violation. **Stop was**
5 **made.**

6 6. I went to court; and I pleaded not guilty.

7 7. At the trial, while I was found guilty as charged, 2 points I believe are
8 significant.

9 7A. One, I asked the officer who had given me the citation to recite some Vehicle
10 Code sections from memory. My purpose was to establish whether he gave me the
11 citation in the course of his regular job or was it done because he was "out to get
me." Court objected.

12 7B. Second, on the day the citation was given, after several hours when I came
13 back to my car, 2 police cars were waiting nearby. One car (or perhaps both)
14 followed me. I asked officer who they were and why was I followed. Officer said
he had no idea. But then court objected to the question. I did not believe him that
he did not know them.

15 8. As I said before, I lost the case.

16 9. I appealed.

17 10. I wrote appellant's opening brief. There was no response.

18 10A. I went for oral argument. Opposing side was not there.

19 10B. But I lost the appeal. The appellant judge wrote an opinion against me.

20 10C. We are an adversary system. I won by default. And yet I lost my appeal and
21 judge wrote an opinion against me. That is a violation of my civil rights and/or a
22 violation of my constitutional rights based on the 14th Amendment to the U.S.
Constitution – due process of law and equal protection of law.

23 11. But this cause of action is against the city of Santa Ana on behalf of their
24 police department for giving me a citation based on a State law, Vehicle Code
25 section 22450(a) which is unconstitutional per Article 1, Section 1 of the California
Constitution.

26 12. As a proximate cause of the aforementioned plaintiff has suffered a
27 considerable damage.

28 12A. Value of this damage is \$4,417.94.

1 12B. Plaintiff believes that events mentioned in the 3rd and 4th C. O. A. are a result
2 of this case. And cops and deputies unions, I believe, are involved with them. P2,
3 person who hit me with truck to force the front of my car into the next lane, is an
4 agent of the city cops, Sheriff's deputies and/or deputies' union.

5 13. Plaintiff prays for money judgment from the city of Santa Ana on behalf of
6 their cops for \$4,417.94.

7 13A. Plaintiff prays for relief from city of Santa Ana on behalf of their cops for
8 mental anguish as court deems appropriate.

9 13B. Plaintiff prays for judgment for punitive and exemplary damages as court
10 deems appropriate.

11 **Wherefore,** plaintiff prays for judgment as hereunder set forth.

12 **Third Cause of Action**

13 **Attacking me on the Freeway SH55**

14 1. All the paragraphs, including subparagraphs, if any, of the first and second
15 causes of actions are incorporated herein by reference thereto.

16 2. This cause of action is against the city of Santa Ana for their cops, the deputies
17 union and P2 for attacking me on SH55. P2 has been or would be referred to
18 elsewhere and is mentioned here for reference purpose only.

19 3. This court has jurisdiction of this cause of action per 28 USC 1331 for violation
20 of civil rights and per 1332 for diversity.

21 4. I had an accident on or about 2-8-2017 at SH55 in Orange County.

22 5. An accident report by CHP accused me of being at fault 50%. I am at fault 0%.
23 Not only that, I believe, this so called accident was actually an assault and battery.
24 I was attacked on the freeway.

25 5A. I believe accident report accusing me of being at fault 50% was falsified. As I
26 said before, I am at fault 0%.

27 6. As a proximate result of this attack I have suffered a damage of \$4,417.94.

28 6A. As a proximate result of this attack my driving record has been adversely
affected.

1 7. As a proximate result of this attack, I have suffered a considerable mental
2 anguish.

3 8. Plaintiff prays for a compensatory relief in the amount of \$4,417.94 from the
4 city of Santa Ana.

5 9. Plaintiff prays for judgment for this mental anguish in the amount as the court
6 deems appropriate.

7 **Wherefore**, plaintiff prays for judgment as hereunder set forth.

8 **Fourth Cause of Action**

9 **Attacking me on the Freeway 210**

10 1. All the paragraphs, including subparagraphs, if any, of the first, second and third
11 causes of actions are incorporated herein by reference thereto.

12 2. This C.O.A. is against the OCSD on behalf of the OCSDU and LACSDU jointly
13 and severally. The person who hit me, I believe, was an agent of these unions.

14 3. I had an accident on or about 8-31-2017 at route 210 in Los Angeles County.

15 4. I believe that this so called accident was actually an assault and battery. I was
16 attacked on the freeway.

17 5. They tried to get my car declared salvage. DMV refused to renew my
18 registration. It took me over 3 months to get my sticker.

19 6. As a proximate result of this attack, I have suffered a considerable mental
20 anguish.

21 6A. Value of this damage is undetermined.

22 7. After I got my registration, a belt in my car broke on 1-2-2019. I believe, my car
23 was vandalized.

24 7A. I believe, it was vandalized by someone working for the deputies union
25 directly or indirectly.

26 8. As a proximate result of this attack I suffered a damage of \$114.

27 9. Plaintiff prays for a compensatory relief in the amount of \$114 from O.C.
28 Sheriff's Department on behalf of their deputies' union.

1 10. Plaintiff prays for judgment for this mental anguish in the amount as the court
2 deems appropriate.

3 11. I pray for an injunction against the deputy's union and its agents not to harass
4 me in any manner whatsoever.

5 **Wherefore**, plaintiff prays for judgment as hereunder set forth.

6 **Fifth Cause of Action**

7 **Violating Due Process and Equal Protection of Law**

8 1. All the paragraphs, including subparagraphs, if any, of the first thru fourth
9 causes of actions are incorporated herein by reference thereto.

10 2. This cause of action is against the Orange County Superior Court.

11 3. This court has jurisdiction of this cause of action for all the State remedies have
12 been exhausted.

13 4. As referred in the 9th paragraph of the 2nd C.O.A. I appealed.

14 5. I wrote appellant's opening brief. There was no response.

15 5A. I went for oral argument. Opposing side was not there.

16 5B. But I lost the appeal. That is a violation of my civil rights and/or a violation of
17 my constitutional rights based on the 14th Amendment to the U.S. Constitution –
due process of law and equal protection of law.

18 6. Judge of the Appellant department of the Superior Court wrote an opinion
19 against me.

20 6A. We are an adversary system. When opposing side did not file a response brief
21 to the opening brief and did not show up for oral argument, plaintiff won appeal by
default because we are an adversary system.

22 6B. The Superior Court violated plaintiff rights based on the 14th amendment to the
23 U.S. Constitution by writing an opinion against him.

24 7. As a proximate result of that plaintiff has been damaged in the amount of money
which is undetermined.

25 8. Plaintiff believes and there on alleges that both of the accidents/attacks on him
26 on SH55 and route 210 were the result of that decision.

27 9. Plaintiff pray for an injunctive relief order to the Orange County Superior Court
28 to correct its wrong decision.

Sixth Cause of Action

State Law Unconstitutional

1. All the paragraphs, including subparagraphs, if any, of the 1st thru 5th causes of actions are incorporated herein by reference thereto.
2. This cause of action is against the Orange County Superior Court.
3. This court has jurisdiction of this cause of action for all the State remedies have been exhausted.
4. That the State law Vehicle Code section 22450(a) is unconstitutional.
5. That it is used to harass people and give phony citations. It was used to give me phony citation. **Stop was made.**
6. That it was used to violate my civil rights under the color of law, thus violating 18 USC 242.
7. That all state remedies have been exhausted, including the California Supreme Court.
8. That the subsection (a) of the Vehicle Code 22450 be declared unconstitutional. It violates Article 1, Section 1 of the California Constitution. California Constitution gives people right to pursue and obtain safety. This code section violates that right.
9. Plaintiff pray that V. C. 22450 (a) be declared unconstitutional.

Seventh Cause of Action

Falsifying the Accident Report

1. All the paragraphs, including subparagraphs, if any, of the 1st thru 6th causes of actions are incorporated herein by reference thereto.
2. This cause of action is against the CHP.
3. This court has jurisdiction of this cause of action per 28 USC 1331 and 1332. This matter was taken to Florida for arbitration and I was found liable. The case was taken to Florida, I believe, to take advantage of the falsified accident report.

1 4. The accident on SH55 was not an accident. I believe, it was assault and battery.
2 That P2, truck driver who hit me at about 60 MPH while the traffic was moving at
3 about 20 MPH, was an agent of the SAPD, Sheriff's deputies and/or Sheriff's
deputies union.

4 5. I have provided information to CHP several times. But officer keep on saying
5 conflicting statements, no witnesses etc. While officer was talking to me, I noticed
6 P2 was not there. Officer let P2 leave before he finished talking to me.

7 5B. Officer did not record my statement in his report. He asked me, was I changing
lanes? I told him, no. This statement as I remember was not in the report.

8 5C.

9 6. Based on the information provided, a competent and honest officer can
analytically come to a conclusion that P1 (plaintiff) was at fault 0%.

10 7. As a proximate result of the false accident report the plaintiff has been damaged
11 in the amount of \$4,417.94.

12 6. As a proximate result of the false accident report, plaintiff's driving record has
13 been damaged.

14 7. Plaintiff pray for an injunctive relief order to CHP to correct the falsified
accident report.

15 8. Plaintiff seeks further relief from this court as this court deems appropriate.

16 **Wherefore**, plaintiff prays for judgment as hereunder set forth.

17
18
19 **Eighth Cause of Action**

20 **Holding Arbitration without my Participation and**
21 **without even informing me and Finding me Liable**

22 1. All the paragraphs, including subparagraphs, if any, of the 1st thru 7th causes of
23 actions are incorporated herein by reference thereto.

24 1A. All the paragraphs of the 3rd C.O.A. are incorporated herein by reference
thereto for emphasis purpose.

25 2. This cause of action is against Arbitration Forums (hereinafter referred to as
26 Forums.)

27 3. This court has jurisdiction of this cause of action per 28 USC 1331 and 1332.
28 Forums is located in Florida.

1 4. That the Forums had an arbitration without plaintiff's participation and without
2 even informing him that it was happening.

3 4A. The Forums found plaintiff liable.

4 5. Plaintiff has requested Forums to pay him to get his car repaired. But they have
5 not done it.

6 6. Plaintiff has requested Forums to ask Mercury Insurance informally to pay the
7 plaintiff to get his car repaired. But they have not done it to the best of my
8 knowledge.

9 7. That as a proximate cause of Forums' actions or lack of actions plaintiff has
10 suffered property damage in amount of \$4,417.94.

11 7A. Plaintiff also has suffered harm to his driving record.

12 7B. \$3,000 has to be paid to my insurance company, Integon National Insurance
13 Company, which they have paid and which they don't owe.

14 8. That as a proximate cause of Forum's actions or lack of actions plaintiff has
15 suffered considerable mental anguish.

16 9. This cause arises under violation of the civil rights per 42 USC 1983. This court
17 has jurisdiction per 28 USC 1331 and 1332.

18 10. Plaintiff prays for a money judgment for compensatory relief from the
19 Arbitration Forums in the amount of \$4,417.94.

20 11. Plaintiff prays for a judgment for mental anguish against the Arbitration
21 Forums in the amount of \$1,000,000.

22 13. Plaintiff pray for a judgment for exemplary and punitive damage against the
23 Arbitration Forums in the amount as court deems appropriate.

24 **Wherefore,** plaintiff prays for judgment as hereunder set forth.

Ninth Cause of Action

A Summary of all the Causes of Action

25 1. All the paragraphs, including subparagraphs, if any, of the 1st thru 8th causes of
26 actions are incorporated herein by reference thereto.

27 2. This cause of action is against all the parties involved as have been referred to in
28 the causes of actions one thru eight.

3. This court has jurisdiction of this cause of action per 28 USC 1331 and 1332.

1
2 4. This summary is provided to clarify the facts and to establish that while number
3 of people are involved (perhaps in hundreds) it is one continuous case which
4 started at Journey Substation ... went to Florida ... and is still continuing.

5 4A. The falsified c. r. has not been corrected. All this has been happening because
6 they, whoever they are, have put their ego and/or corruption ahead of their sense
7 duty to law.

8 5. It started when plaintiff went to Sheriff's Journey substation where I have come
9 to believe that they made copies of my papers without my permission and without
10 giving me an acknowledgement that they made copies. So, I assume that they made
11 copies **for personal use** to negotiate their kickbacks with the suspects. Regardless
12 of the deputies involved, captain, at that time as well as the current one, should be
13 held responsible.

14 6. Then the city of Laguna Niguel while took a c. r. but falsified it. I went to see
15 the city attorney to get it corrected. But I was almost attacked by cops and told to
16 leave.

17 7. Sheriff's deputy(s) tried to get me framed. But were not successful.

18 8. Then Sheriff's deputy(s), I believe, got SA city cops to get me harassed by
19 giving me a (phony) citation based on an unconstitutional law (V. C. 22450 (a)) for
20 a stop sign violation. **Stop was made.**

21 9. At the trial,

22 10. At the trial, letter to Sheriff was introduced and accepted as a part of the record.
23 Purpose of offering this letter was to show as to why the citation was given to me.
24 The citation I believe, was given to me to harass me and to prevent me from asking
25 that the falsified c. r. be corrected.

26 11. On appeal, constitutionality of the V.C. 22450(a) was challenged. There was no
27 opposition. We are an adversary system. The V.C. 22450 (a) should have been
28 declared unconstitutional. But it was not done. This section of Vehicle code was
used to violate my civil rights under the color of law (a violation of 18 USC 242).

12. On appeal, there was no opposition. But an opinion was written against me. It
violated my rights to equal protection of law under Equal Protection of Law
provision of the 14th amendment to the U.S. Constitution.

13. I had an accident on SH55 in Orange County on 2-8-2017. I believe, it was an
assault and battery.

1 14. I believe, accident report was falsified. In spite of my several attempts to have
2 it corrected, it has not been corrected.

3 15. Then on or about 8-31-2017 I had another accident in Los Angeles County on
4 Route 210. Again, I believe, it was an assault and battery.

5 16. As a result of the accident in L. A. County on Route 210, my car was labeled
6 salvage. DMV refused to renew my registration. It took me over 3 months of hard
7 work and mental anguish to get my registration renewed. Finally, I got my sticker
8 in late December 2018 while my registration expired in September.

9 17. While driving on freeway my car overheated. I discovered that the belt which
10 drives water pump was broken. It happened on 1-2-2019. I suspect that someone
11 vandalized my car. I suspect a Doe working for the deputies' union did it. Deputies'
12 union is a suspect. I paid \$114 to get my car repaired.

13 17A. I pray for compensatory relief for \$114 from the O.C. Sheriff's Department
14 on behalf of their deputies and their agents.

15 18. All this is for clarification and to show that attacks on me are ongoing. I don't
16 know when they are going to hit me, where they are going to hit me, how they are
17 going to hit me etc. So it creates a lots of anxiety and mental anguish. That is
18 where I stand.

19 **Wherefore**, plaintiff prays for judgment as hereunder set forth.

20 **PRAYERS:**

21 1. **Wherefore** the plaintiff prays for injunctive relief orders as follows:

- 22 a. to Superior Court to correct its decision.
- 23 b. To Sheriff Department to correct the falsified c. r.
- 24 c. To City of Laguna Nigel to correct the falsified c. r.
- 25 d. To City of Santa Ana to prevent its PD from harassing me, attacking me
and/or having me attacked me by others in any manner whatsoever.
- 26 e. To CHP to correct the falsified accident report.
- 27 f. To O. C. deputies union to prevent it from harassing, attacking and/or
28 getting me attacked by others in any manner whatsoever.

29 2. Plaintiff prays for money judgment for mental anguish from the city of Laguna
30 Nigel in the amount of \$1,000,000.

31 3. Plaintiff prays for exemplary and punitive money judgment from the city of
32 Laguna Nigel in the amount as this court deems appropriate.

1
2 4. Plaintiff prays for specific money judgment from the Arbitration Forums in the
amount of \$4,417.94.

3 5. Plaintiff prays for money judgment of mental anguish from the Arbitration
4 Forums in the amount of \$1,000,000.

5 6. Plaintiff prays for exemplary and punitive money judgment from Arbitration
6 Forums in the amount as this court deems appropriate.

7 7. That plaintiff prays for money judgment in the amount of \$114 from the O.C.
8 Sheriff's Department on behalf of their deputies' union.

9 8. That California Vehicle Code section 22450 (a) be declared unconstitutional.

10 9. Cost of this suit.

11 10. Any other relief the court deems appropriate.
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